

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**DE AUNDRE KEYS,**

**Defendant**

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**CRIMINAL NO. PJM-21-502**

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**GOVERNMENT’S SUPPLEMENTAL MEMORANDUM IN AID OF SENTENCING**

The United States of America hereby supplements its sentencing memorandum regarding Defendant De Aundre Keys with respect to the issue of restitution. For the reasons set forth below, the Government respectfully requests that, in addition to the sentence described in the Government’s previously filed memorandum, the Defendant be ordered to pay restitution in the amount of \$12,458.<sup>1</sup>

**I. Restitution**

Section 3663A of Title 18 of the United States Code provides that, when sentencing a defendant convicted of an offense “in which an identifiable victim . . . has suffered a physical or pecuniary loss,” a court “shall order . . . that the defendant make restitution to the victim of the offense or, if the victim is deceased, to the victim’s estate.” § 3663A(a)(1), (c)(1)(B). Where the offense has resulted “in bodily injury that results in the death of the victim,” this order should require the defendant to “pay an amount equal to the cost of necessary funeral and related

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<sup>1</sup> The Government previously provided to the Court victim impact statements of family members of Victim 1. On January 17, 2023, the Government received from Victim 1’s family documentation of funeral expenses supporting this restitution request, which the Government is providing herewith. The Government also anticipates that members of Victim 1’s family will be present at sentencing.

services.” § 3663A(b)(3); *see also* 18 U.S.C. § 3663(b)(3). In addition, under 18 U.S.C. § 3663, a court sentencing a defendant convicted of an offense under 21 U.S.C. § 841, as in this case, may order “that the defendant make restitution to any victim of such offense, or if the victim is deceased, to the victim’s estate.” 18 U.S.C. § 3663(a)(1)(A). “The court may also order restitution in any criminal case to the extent agreed to by the parties in a plea agreement.” 18 U.S.C. § 3663(a)(3).

Pursuant to the plea agreement in this case, the Defendant agreed “to the entry of a Restitution Order for the full amount of the losses attributable to Victim 1’s death as described in the factual stipulation.” ECF No. 33 (Plea Agreement) at 8 ¶ 19. As established by the attached documentation provided by family members of Victim 1, such losses include \$12,458 in funeral expenses for Victim 1. *See* Exhibit 2 (paid invoice for \$11,558); Exhibit 3 (receipt for \$900). Accordingly, the Government respectfully requests that the Court order restitution in the amount of \$12,458.

Respectfully submitted,

Erek L. Barron  
United States Attorney

By: \_\_\_\_\_ /s/  
Jessica C. Collins  
Assistant United States Attorney